

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

§

VS.

§

SA-21-CR-449 XR

MARCO ANTONIO ZUNIGA-CARBAJAL

§

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Defendant in the above entitled and numbered cause by and through his attorney of record, and moves the Court to continue this cause and all deadlines in the present standing scheduling order. In support thereof, Defendant would show unto this Court the following:

I.

The Defendant is charged in a multi count indictment before this court.

II.

The defendant is represented by attorney, ALBERT A. FLORES.

III.

The Defendant respectfully requests that the Court grant a motion for continuance and a new scheduling Order based on the following:

1. The Attorney requests more time to investigate the circumstances surrounding the arrest of the defendant and the possibility of a defense arising out of that investigation. The review of all relevant evidence is necessary to properly prepare for trial and/or for the Attorney to properly assess the relevant conduct in this case.

2. The AUSA in this case does not oppose a continuance.

The Defendant does not request this continuance for purposes of undue delay, but so that he may receive a proper and effective assistance of counsel. The protection of due process rights, effective assistance of counsel, and preparation of an adequate defense afforded by a continuance in this case, would greatly outweigh the public's interest for quick resolution of this matter.

WHEREFORE, premises considered, Defendant prays that this Court grant his motion for continuance and issue a new Rearraignment and Plea date.

Respectfully submitted:

Albert A. Flores

ALBERT A. FLORES
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Defendant's Motion has been delivered to the United States Attorney's Office, Mr. Eric Yuen, SAN ANTONIO, Texas, on this the 22nd day of June, 2023 via the court's ECF system.



ALBERT A. FLORES

IN THE UNITED STATES DISTRICT COURT
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ORDER

On this the ____ day of _____, 20____, came to be considered Defendant's Motion for a
Continuance, and said motion is hereby

(GRANTED) (DENIED)

UNITED STATES DISTRICT JUDGE